
Modern Slavery Statement

2021/22

Version 3.0



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Contents

2.0

About us

Our structure
Our operations
Our values
The impact of COVID-19
Our projects
Our supply chain

3.0

The risks of modern slavery in our operations and supply chain

In our operations
In our supply chain

4.0

Actions taken to assess and address the risks, including due diligence and remediation processes

5.0

How we assess the effectiveness of our actions

6.0

Process of Consultation

7.0

Approval and Statement annexure

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01 |

Introduction

The ILO's Global Estimates¹ indicates:

- there are 50 million people in situations of modern slavery on any given day; and
- sixteen percent of all adults in forced labour exploitation, 2.6 million people, are in the construction industry. Many cases involve migrant workers whose situations of forced labour stem from extortionate recruitment fees and other fraudulent recruitment practices of unscrupulous labour intermediaries.

Significantly, at least 22% of forced labour victims are found in the manufacture and production of raw materials including in forestry, mining and quarrying – key suppliers for property and construction.²

Roberts Co's goal is to eliminate modern slavery in its operations and supply chains. Achieving our goal continues to be a multi-year project and requires all of us to work together to protect the rights of the world's most vulnerable people.

¹ ILO Global Estimates of Modern Slavery September 2022
<https://www.walkfree.org/reports/global-estimates-of-modern-slavery-2022/>

² Australian Human Rights Commission, "Property, construction & modern slavery" 2020

02 |

About us

This Modern Slavery Statement is made by Roberts Co Australia Pty Ltd ABN 83 616 561 678 (Roberts Co) for the year ended 30 June 2022 (FY22) pursuant to the Modern Slavery Act 2018 (Cth) (Modern Slavery Act).

Roberts Co is a privately held company committed to driving positive change in the Australian construction industry. It operates in New South Wales and Victoria via its wholly owned subsidiaries, Roberts Co (NSW) Pty Ltd and Roberts Co (VIC) Pty Ltd, which are also reporting entities. This statement is submitted by Roberts Co Pty Ltd on behalf of itself and the aforementioned subsidiaries. When we refer to "Roberts Co", "we" "us" or "our" in this statement, it is a reference to the three reporting entities.

Our operations

Roberts Co has approximately 200 employees, all of whom are located in New South Wales and Victoria. The very large majority of our employees are employed on a full time, permanent basis. The roles performed by our employees include origination, corporate services and project delivery, including constructions workers. We employ a small number of trainees and apprentices.

Roberts Co delivered work for both private and government clients within NSW and Victoria, inclusive of commercial, education, residential, health, pharma and hospitality.

Our structure

Roberts Co is an Australian based, and owned, tier-one construction company delivering design and construction services within the states of NSW and Victoria.

We have the following teams in our operations, namely:



Origination



project delivery & design



Finance, HR, legal, IT and insurance

Our registered office and principal place of business is:

Level 9, 60 Castlereagh St, Sydney NSW 2000.

In April 2022, Roberts Co acquired six Victorian projects under construction that have been the subject of the external administration of Probuild Construction (Aust) Pty Ltd.

This acquisition paved the way for the continued employment for more than 150 Probuild and Monaco Hickey employees, whilst also honouring the head building contract, sub-contractor agreements and consultant agreements and other project costs on these projects that were in place at the time Probuild and Monaco Hickey entered administration. Importantly, more than 150 sub-contractors and consultants were paid valid arrears, all retention monies were reinstated and were able to get their people and equipment back to work.

Our values

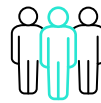
**We exist to do good, not just make good.
To look forward. To innovate.
To push. To lead. To change.**

We recognise the inherent dignity of all people and the importance of respecting and promoting human rights, including the rights of our employees, suppliers and the communities in areas where we operate.

We also expect our suppliers and contractors to respect and promote human rights and encourage any joint ventures to adopt a similar approach.

Our approach to assessing and addressing modern slavery, as well as broader human rights, continues to be guided by the United Nations Guiding Principles on Business and Human Rights. In keeping with our hallmark ambitions underpinned by “how we interact with and care for our people, industry partners and the community” and our desire to “drive change in the Australian construction sector”, Roberts Co is committed to adopting industry best practices and standards as part of the global efforts to eradicate modern slavery.

Our values are an expression of what is important to us. Consideration of human rights and modern slavery is integral to our broader commitment to diversity, inclusion, wellbeing and aligns strongly with our organisational values as shown opposite:



Empowered People

Strong leadership is in place at Roberts Co, but our flat structure gives everyone a voice. We believe in empowering our team to be the best they can be - exceptional ideas are encouraged and supported no matter who they come from.



Working Smarter

We're concerned with getting things done right and making a difference. We seek teams of diverse thinkers and pivot as needed to increase value and efficiency. We embrace technology and use it to improve our projects, our productivity and our work/life balance.



Relationship Driven

We build relationships as well as projects, fostering true partnerships that stand the test of time. We respect the expertise of our colleagues, clients, subcontractors and consultants because we know it takes a team to build a project.



Creating Value

We are results oriented and have pride in our work. We'll always offer design smarts to enhance our clients' results.



The impact of COVID-19

We have continued to be mindful of the potential impact of COVID-19 on our business, supply chains and our community this year.

As the impacts of the pandemic continues to be felt across the world, we have continued to assess and monitor our supply chains, being conscious of the increased number of vulnerable workers who may be at risk of being exploited. As construction and investment in infrastructure picks up pace, the vulnerability

of these worker groups may be exacerbated, as people choose work, irrespective of conditions.³

As part of our awareness of the need to assist our subcontractors during periods of shutdown, we continued payment throughout those periods. We are conscious of the impact that unexpected periods of non-payment can have on smaller subcontractors and their employees.

³ Australian Human Rights Commission, "Property, construction & modern slavery" 2020

Our projects

During the FY22, we worked on nine key projects across NSW and Victoria. Those projects were:



01

Schools at Meadowbank Education and Employment Precinct (SMEEP)

A multi-level, multi-purpose, integrated school building with a primary school wing and high school wing for over 2500 students.



06

500 Bourke St

Redevelopment of a 40-storey high rise office building at 500 Bourke Street, including services upgrades, lobby upgrade and new amenities.



02

Macquarie Exchange Precinct Project (MQX4)

MQX4 is the first of four new commercial office buildings that will form the centre of Macquarie Exchange – Australia's first community business district.



07

502 Albert St

4.5-star boutique hotel, including pool and spa facilities, gymnasium and guest lounge. The 15-level tower will include 140 hotel rooms; two basement levels; food and beverage on ground floor; and a rooftop terrace on level 14.



03

Moxy Sydney Airport Hotel

The construction of a proposed new 13-storey hotel comprising of 301 hotel rooms; reception, lounge/waiting area, café, library, restaurant and back of house services on the ground floor.



08

130 Little Collins St

A state-of-the-art commercial precinct at 130 Little Collins in Melbourne's CBD, with 27 levels of premium office space.



04

Elizabeth North Stage 2

Stage 2 comprises a 16-storey building that will accommodate collaboration between academic institutions and industry, supporting and advancing Melbourne's position as a centre for research, development and innovation.



09

CSL Hawara

The facility consists of 16 levels including 7 levels of office fit out and 9 levels of laboratories, consisting of commercial office space, conference facilities, common facilities, cleanrooms and laboratories. The fit out will be integrated with the base build at Elizabeth North Stage 2.



05

UNO Melbourne

A 65 storey apartment building, including the restoration of the heritage façade, excavation and construction of a new two-level basement back to ground level.

Our supply chain

In FY22, Roberts Co’s procurement spend was approximately \$200m. The main categories of spend from our project teams and finance, HR, legal, IT and insurance team remain largely unchanged from year to year. An overview of the categories is set out below. It reflects the categories for both Roberts Co and Probuild projects from FY22.



Project teams

Items denoted with * are manufactured overseas

Subcontractors and labour

- Construction survey
- Traffic control
- Masonry works
- Painting
- Turntable
- Electrical security comms services
- Fire protection services
- Hydraulic services
- Lift services
- Mechanical and BMS services
- Demolition / earthworks
- Reinforcement fix
- Construction site cleaning
- Engineering
- Architectural services
- Labour hire
- Site security
- Waterproofing services

Materials and labour

- Hoarding
- Scaffolding
- Access flooring
- Carpet and flooring
- Windows
- Metalwork
- Ceilings and partitions
- Green walls
- Air conditioning
- Electrical and data services
- Doors and frames
- Inter-tenancy stairs
- Concrete – supply and place
- Façade* such as glass, aluminium, terracotta, Fibre C, GRC and aluminium cladding
- Formwork
- L2 transfer wall prefab cage
- Podium façade
- Post tensioning
- Tiles*
- Stone*
- Joinery*

Materials

- Steel*
- Concrete
- Reinforcement supply
- Pipes

Equipment

- Hoarding and jumpform signage
- Loading platforms
- People and materials hoists
- Rubbish bins
- Site sheds
- Tower crane
- Appliance



Finance, HR, legal, IT and insurance

- IT software
- IT equipment
- Merchandise
- Corporate travel and hospitality
- Catering
- Insurance broker and insurance services
- Advisory services, including professional services
- Training
- Recruitment
- Office supplies
- Office cleaning
- Utilities
- Rent

Of the above, our top spend categories were: subcontractors, labour and materials.

Our major sourcing regions were:

- Australia
- China
- South East Asia
- Europe

Most of our direct suppliers are domiciled in Australia, although they often supply goods or services sourced from other jurisdictions. Our subcontractors mostly supply the construction materials to be used on our projects, so this limits our visibility of the risks associated with these parts of our supply chain. Transport and logistics are also primarily acquired by our suppliers, subcontractors or their suppliers.

03 |

The risks of modern slavery in our operations and supply chain

The risk of modern slavery practices within our business were assessed on their potential to cause, contribute to or be directly linked to modern slavery through our operations and supply chains, as grounded in the human rights due diligence framework outlined in the United Nations Guiding Principles on Business and Human Rights.

In our operations

The Global Slavery Index 2018 estimates that on any given day in 2016 there were 15,000 living in conditions of modern slavery in Australia, a prevalence of 0.6 victims of modern slavery for every thousand people in the country.⁴ Updated statistics are due to be released by the Walkfree Foundation in 2023. In the interim, it is possible that these figures have increased since 2016 in line with the overall increase of approximately 10 million worldwide in the global prevalence of modern slavery as foreshadowed in the introduction to this statement. In this context, we recognise that modern slavery risks exist in Australia and are heightened in the construction sector. However, having regard to the following factors, the risk that we have caused or contributed to modern slavery in our operations remains low:

- ✓ Our executive leadership team continues to meet regularly to discuss business risk, which ensures that they have visibility of the risk of modern slavery in our operations and the controls adopted to manage those risks.
- ✓ We maintain strong human resources controls in place for onboarding new employees, reviewing employees' wages and salary agreements, and verifying corresponding payments. These form part of our Integrated Management Systems that control the processes within our businesses.
- ✓ Approximately 88% of non-managerial employees are covered by enterprise or industrial agreements.
- ✓ Our employee on-boarding processes include working rights employment checks managed by our Human Resources group.
- ✓ Our employee induction processes also ensure that new employees confirm they have read and understood our policies and minimum standards.
- ✓ Human rights and Modern Slavery are part of our induction processes ensuring that everyone working on our projects has a basic awareness of the risks and ways to report
- ✓ We do not have operations or employees overseas.

⁴ Walkfree Global Slavery Index 2018 <https://www.globalslaveryindex.org/2018/findings/country-studies/australia/>

In our supply chain

The selection of construction materials is often made by either the customer (where a particular material is specified, which can only be sourced from one supplier) or the subcontractor supplying labour and materials. It is difficult for a construction company such as ours to have visibility across the multiple tiers in the supply chain of the numerous components and raw materials that are used on all of our construction sites. However, as part of our due diligence efforts, we periodically review and assess our procurement data for modern slavery risks and endeavour to keep abreast of emerging or evolving risks relevant to the construction sector.

Materials and construction services, including labour hire are the main areas of higher risk in our business. Modern slavery risks can be exacerbated by a number of factors relevant to the construction sector, some of which are listed below:

- prevalence of outsourcing, which can impact upon operational and supply chain transparency
- contract terms with low margins and significant pressure on delivery times
- reliance on a migrant workforce with limited local language competency and temporary visa arrangements
- jurisdictional risk and industry risk in the supply of some construction materials
- multiple sub-contracting arrangements with informal agreements
- low barriers for entry for labour hire providers
- dangerous or substandard working conditions, including:
 - » workers are not paid fairly or withheld entitlements
 - » workers may be required to work excessive hours
 - » workplace safety concerns
 - » control of workers' freedom of movement or association
 - » withholding unreasonable fees for housing, transportation, food and other services

Debt bondage is one of the slavery-like practices that can occur in the construction sector where bonded labourers have to work to pay off debts that are often greater than the wages earned, resulting in an inability to leave. We are not aware of any instances of debt bondage at our sites.

The majority of our suppliers are domiciled in Australia. They predominantly provide labour and materials, as well as services. The materials used in the construction sector are often produced in countries where modern slavery is a greater risk, which means that modern slavery risks may exist in our supply chain well beyond the second or third tier across multiple procurement categories. The transport of these materials to Australia also creates modern slavery risk (noting that transport and logistics are inherently high risk for modern slavery).

This means that, although there is a lower risk that our business has caused or contributed to modern slavery, our connection to modern slavery exists via our supplier relationships and their respective supply chains.

Based on our updated risk assessment for FY22, we consider the following construction categories to contain an increased risk profile. Our assessment involved looking at the inherent industry risks linked to the potential utilisation of higher risk components or raw materials and the potential utilisation of vulnerable categories of workers in the production of the materials.

- Ceilings and partitions
- Podium façade
- Stones
- Tiles
- Steel
- Concrete
- PVC pipes
- Site sheds
- Scaffolding
- Demolition and earthworks
- Formwork
- Reinforcement fix
- Façade
- Masonry works
- Painting
- Doors and frames
- Loading platforms
- Hoists
- Rubbish bins
- Tower cranes
- Service plants and equipment

Emerging risks – PVC materials

A report was published in June 2022 by Sheffield Hallam University and the Helena Kennedy Centre for International Justice in relation to the increased manufacturing of PVC in the Uyghur region in China, the manufacturers' use of state-sponsored labour transfers and the routes by which the resulting PVC-based products may make their way into international markets.⁵ Most products made from PVC are used in building and construction in the form of pipes and vinyl flooring. China is the world's largest producer of PVC and 20% of China's PVC comes from the Uyghur region which has been linked to forced labour. The report states that "state-sponsored labor transfer programs are tantamount to forcible transfer of populations, forced labor, human trafficking and enslavement". In light of this report, we recognise there risks in the PVC pipes and flooring materials that we use on our construction sites which warrants further due diligence.

Based on our risk assessment for FY22, the proportion of high, medium and low risk categories as against our suppliers by volume and spend is shown below:

Risk profile	% of total suppliers	% of total spend
High	22%	35%
Medium	34%	22%
Low	44%	43%

In addition to the risks associated with procurement in the construction sector, there are also modern slavery risks in the goods and services procured for our office operations supporting our finance, HR, legal, IT and insurance. For example, there are inherent risks in production of the corporate merchandise and supplies we purchase as well as the IT hardware that we use day to day. We also recognise the modern slavery risks in the cleaning sector arising from exploitative labour practices.

⁵ <https://www.shu.ac.uk/helena-kennedy-centre-international-justice/research-and-projects/all-projects/built-on-repression>

04 |

Actions taken to assess and address the risks, including due diligence and remediation processes

We recognise our responsibility under the UNGPs to provide or participate in the remediation of any identified human rights impacts that we cause or contribute towards. During the course of the Reporting Period, we have not identified any reports that could be linked to modern slavery. If, hypothetically, we found that our business had caused or contributed to modern slavery, we would take guidance from the UNGPs, which provides that businesses in this situation need to remediate the impact by taking a person centred approach protecting the safety, privacy and wellbeing of the affected person. We would investigate the situation to ensure that an appropriate corrective action plan is implemented and assess how similar impacts could be avoided in the future.

Our work during FY22 built upon the goals set out in our FY21 statement. Our existing policies and procedures are described in Annexure A. We progressed most of the goals that we set for ourselves in our FY21 statement to ensure that our approach to assessing and addressing modern slavery risks remains effective. In summary, the actions we have taken in FY22 are set out below:

Our work to manage our modern slavery risk is ongoing

04 | Actions

In summary, the actions we have taken are set out below:

- Revised the IMS manual, procurement guidelines and forms used for the procurement of subcontractors to include modern slavery considerations
- Revised procurement processes to include modern slavery due diligence on suppliers prior to engagement. This included engaging subcontractor and suppliers that advised that they have in place adequate procedures to manage modern slavery risk;
- Rolled out the Modern Slavery Policy through a training programme and internal communications were issued by the CEO and displayed on site noticeboards. This training was facilitated by an external human rights expert.
- Developed a poster to be placed at various locations on our project sites raising awareness of modern slavery and our whistleblowing processes
- Partnered with Dexus on an approach to prevent modern slavery on construction sites - during the year, Dexus and Roberts Co held workshops to share knowledge on each organisation's approach to combatting modern slavery.
- Included modern slavery risk in our risk register and processes and reviewed the risks of modern slavery every six months at our Management Review Meetings.

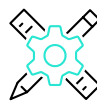
Goals from our previous statement

- (1) Continued to monitor whistleblower reports for trends relevant to modern slavery.
- (2) Reviewed the currency of our risk assessment in our construction supply chain.
- (3) Continued the industry collaboration to assess modern slavery risks in the procurement supply chains.

Additional actions taken

- (4) With the support of external subject matter experts, we performed a gap analysis in relation to our policies and procedures to assess potential human rights gaps. For completeness, this included a gap analysis of practices on Probuild sites since we acquired six of their sites during the Reporting Period. We identified the actions needed to close out the gaps and to strengthen our internal processes.
- (5) We explored the different due diligence platforms available on the market with a view to improving visibility in the extended supply chains by deploying a technology solution.

Unsafe workplaces that impact worker rights can reflect modern slavery risk. We are committed to protecting the health and safety of all workers on our sites, including both our own employees and representatives of subcontractors and other staff. Protecting worker rights is a further means by which we manage modern slavery risk.



Project 5: A weekend for every worker

A research project commissioned by Roberts Co & Health Infrastructure

In May 2022, we unveiled the results of a two-year project in partnership with research experts from UNSW and Health Infrastructure. The research has highlighted the success of a Monday-Friday work week at the \$341 million Concord Hospital Redevelopment to improve the health and wellbeing of construction workers in the sector.

Compared to the general population and other occupations, construction workers have higher rates of physical injury, serious mental health disorders and suicide. Workers examined as part of the Project 5 study reported an increase in job satisfaction including pay, job security, and improved work/life balance. This resulted in improved cohesion and productivity on site between workers and management, and importantly no impact on the cost to deliver projects. The five-day working week is now being rolled out across other major construction projects, including the redevelopment of The Children's Hospital at Westmead.

05 |

How we assess the effectiveness of our actions

Our approach to assessing the effectiveness of our program is underpinned by progressing a number of goals that we set for ourselves each year and setting new goals for the next reporting period.

Our work in this area is overseen by the CEO and the Board. As part of our ongoing efforts, we have expanded our metrics for assessing the effectiveness of our actions to include the following goals for FY23:



Consideration of a third-party service provider for a due diligence technology solution and prepare supplier lists for the purposes of conducting the modern slavery due diligence



Update the policies and procedures as required following the results of the gap analysis



Provide updated modern slavery training for our employees and key suppliers



Consider ways to make our whistleblowing mechanisms more accessible to workers on our sites



Undertake an audit to assess whether key suppliers have incorporated equivalent modern slavery terms in their subcontractor arrangements



Review of the number of key suppliers who have adopted commitments to manage modern slavery risk (to be continued as a goal from the FY21 statement for FY22)

06 |

Process of consultation

All of the reporting entities share directors and report to the same executive team.

By its nature, the assessment and management of modern slavery risk requires the involvement of representatives of the commercial, procurement, finance legal and IT (including human resources) teams, as well as the oversight of management. The individuals involved in the preparation of this statement were consulted in relation to all of the reporting entities. These entities do not otherwise have owned or controlled entities that require consultation to prepare this statement. This statement reflects the work undertaken during the year of representatives of all of these teams within Roberts Co.

Both of the reporting entities share directors and an executive team



07 |

Approval

This statement for the financial year ending 30 June 2022 is made pursuant to section 14 of the *Modern Slavery Act 2018 (Cth)* and has been approved by the Board of Roberts Co, the members of which also constitute the board of its subsidiary, Roberts Co (NSW) Pty Ltd, on 16/12/2022 at Level 9, 60 Castlereagh St, Sydney. This statement is signed by a responsible member of the Board of Roberts Co, the higher entity, as defined by the Act.

Signed,











Alison Mirams
CEO
16/12/2022



Statement Annexure

Mandatory criteria	Page number/s
Identify the reporting entity	2
Describe the reporting entity's structure, operations and supply chains.	2, 3, 4, 5
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	6, 7
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	8, 9
Describe how the reporting entity assesses the effectiveness of these actions.	10
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	11

Annexure A

-  Health and Safety Policy
-  Environmental Policy
-  Quality Policy
-  Drug and Alcohol Policy
-  Return to Work Policy
-  Industrial Relation Policy
-  Modern Slavery Policy
-  Whistleblower Policy

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